

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE:) BANKRUPTCY CASE
))
LAWRENCE VERSSELL WEBSTER,) NO.: 17-10664
))
Debtor,) CHAPTER 13
))
) JUDGE: PAMELA S. HOLLIS
) (Joliet)

NOTICE OF MOTION

TO: SEE ATTACHED ADDRESSES

PLEASE TAKE NOTICE THAT ON August 17, 2018 at 10:45 am, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Pamela S. Hollis, U.S. Bankruptcy Judge, 150 West Jefferson Street, 2nd Fl, Joliet, Illinois 60432, and shall then and there present the attached Motion and at which time you may appear if you so desire.

CERTIFICATION

I, the undersigned Attorney, Certify that I served a copy of this Notice to the Addresses attached by electronic notice through ECF or by depositing the same at the U.S. Mail at 1 North Dearborn, Chicago, Illinois 60602 at 5:00 P.M. on August 1, 2018, with proper postage prepaid.

McCalla Raymer Leibert
Pierce, LLC

Kinnera Bhoopal
/s/Kinnera Bhoopal
ARDC# 6295897

1 N. Dearborn Suite 1200
Chicago, IL 60602
(312) 346-9088

**Pierce & Associates, P.C. and McCalla Raymer, LLC combined Firms to form the
Firm McCalla Raymer Pierce, LLC.**

**This is an attempt to collect a debt and any information obtained will be used for
that purpose.**

File No. WICC-17-00668

NOTICE OF MOTION ADDRESSES

To Trustee: *by Electronic Notice through ECF*

Glenn B Stearns
801 Warrenville Road
Suite 650
Lisle, IL 60532

To Debtor:

Lawrence Versell Webster
347 CLUBHOUSE ST
Bolingbrook, IL 60490 *Served via U.S. Mail*

To Co-Debtor:

JACQUELYN WEBSTER
347 CLUBHOUSE ST
Bolingbrook, IL 60490 *Served via U.S. Mail*

To Attorney:

Adam Suchy
Geraci Law L.L.C.
55 East Monroe #3400
Chicago, IL 60603 *by Electronic Notice through ECF*

McCalla Raymer Leibert Pierce, LLC
Attorney For: Creditor
1 N. Dearborn Suite 1200
Chicago, IL 60602
(312) 346-9088
File No. WICC-17-00668

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MOTION TO MODIFY THE AUTOMATIC STAY AND CO-DEBTOR STAY

NOW COMES Federal National Mortgage Association (“Fannie Mae”) by and through its attorneys, McCalla Raymer Leibert Pierce, LLC, and requests that the Automatic Stay and Co-Debtor Stay heretofore entered on the property located at 347 Clubhouse St, Bolingbrook, Illinois 60490 be Modified stating as follows:

1. On April 04, 2017, the above captioned Chapter 13 was filed.
2. On June 02, 2017, the above captioned Chapter 13 was confirmed.
3. Federal National Mortgage Association (“Fannie Mae”) services the first mortgage lien on the property located at 347 Clubhouse St, Bolingbrook, Illinois 60490.
4. The Plan calls for the Debtor to be the disbursing agent for the post-petition mortgage payments directly to Federal National Mortgage Association (“Fannie Mae”). Post-petition payments are \$2,359.22.
5. The post-petition mortgage payments are due and owing for October 01, 2017. The default to Federal National Mortgage Association (“Fannie Mae”) is approximately \$23,026.39 through July 2018, including attorney’s fees and costs of this motion.
6. The plan is in material default.

7. Federal National Mortgage Association (“Fannie Mae”) also seeks to modify the stay as to co-debtor JACQUELYN WEBSTER pursuant to 11 U.S.C. §1301(a).
8. Federal National Mortgage Association (“Fannie Mae”) continues to be injured each day it remains bound by the Automatic Stay.
9. Federal National Mortgage Association (“Fannie Mae”) is not adequately protected.
10. The property located at 347 Clubhouse St, Bolingbrook, Illinois 60490 is not necessary for the Debtor's reorganization.
11. The Debtor has no equity in the property for the benefit of unsecured creditors. No cause exists to delay the enforcement and implementation of relief and Bankruptcy Rule 4001(A)(3) should be waived.

WHEREFORE, YOUR MOVANT respectfully prays that the Automatic Stay and Co-Debtor Stay on the property located at 347 Clubhouse St, Bolingbrook, Illinois 60490, be modified, and that Bankruptcy Rule 4001(a)(3) be waived as not applicable, and leave be granted to Federal National Mortgage Association (“Fannie Mae”) to proceed with foreclosure, and for such other and further relief as this Honorable Court deems just.

McCalla Raymer Leibert Pierce, LLC

By: /s/Kinnera Bhoopal
Kinnera Bhoopal
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